

April 18, 2007

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

In Re: CS Docket 97-80, Commercial Availability of Navigation Devices

Dear Chairman Martin,

In response to the Federal Communications Commission's recent *Public Notice*¹ reiterating that downloadable security technology satisfies the requirement for severable security in navigation devices.

Latens is pleased to inform the Commission that Latens 'Conditional Access System' (CAS) which has been deployed in numerous Video delivery systems globally and complies with the Commission's integration ban. Latens CAS is a low cost software based solution which requires no special proprietary hardware components either in the operators environment or at the navigation device.

Consistent with the Commission's goal of 'common reliance'², Latens CAS is available in open licensing terms to any operator or consumer device manufacturer on reasonable and non-discriminatory terms and has been implemented in such a manner for a number of years.

The Latens CAS product has been designed to be deployed in both IPTV and Cable two way networks to enable advanced service offerings such as video on demand, personal video recorders, HDTV and Time Shift TV as well as supporting deployment in broadcast only domains such as Satellite and Digital Terrestrial. Latens CAS is based on open standards and utilizes industry standard encryption technologies and has been proven to be extremely secure by operators and a number of security audits. Latens also provide support for rapid security updates should a security breach occur, which provides for considerable security enhancements and cost savings as compared to hardware based solutions. As such Latens CAS has been approved for content protection by all content providers thus far approached for approval to date.

Today, Latens is in active discussions with cable operators in the US, these operators are very aware of the significant cost reductions and operational efficiencies to be gained from deploying software based conditional access system such as Latens CAS. Such an offering ultimately helps to reduce the cost of both the service and the navigation device to the consumer.

Latens respectfully requests the Commission consider the compliance of Latens CAS to the Commission's objectives of common reliance and separable security and looks forward to working with the Commission, cable operators and equipment manufacturers to ensure the Commission's objectives are met in a timely manner.

¹ Commission Reiterates that Downloadable Security technology satisfies the Commission's rules on Set-Top Box and notes Beyond Broadband Technology's development of Downloadable security solution, *Public Notice*, DA 07-51 (Released: Jan. 10, 2007) ("*Public Notice*")

² See Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices, Second Report and Order, 20 FCC Rcd. 6794 (2005)

Respectfully Submitted,

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CC: Assistant Commissioner Andrew Long